

Hearing Date: TBD

Objection Deadline: April 6, 2012 4:00 p.m. (Prevailing Eastern Time)

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Counsel to Defendants

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

TRONOX INCORPORATED, *et al.*,

Debtors.

**TRONOX INCORPORATED, TRONOX
WORLDWIDE LLC f/k/a Kerr-McGee
Chemical Worldwide LLC, and TRONOX LLC
f/k/a Kerr-McGee Chemical LLC,**

Plaintiffs,

v.

**ANADARKO PETROLEUM CORPORATION and
KERR-McGEE CORPORATION, KERR-McGEE
OIL & GAS CORPORATION, KERR-McGEE
WORLDWIDE CORPORATION, KERR-McGEE
INVESTMENT CORPORATION, KERR-McGEE
CREDIT LLC, KERR-McGEE SHARED
SERVICES COMPANY LLC, AND KERR-McGEE
STORED POWER COMPANY LLC**

Defendants.

THE UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

v.

**TRONOX, INC., TRONOX WORLDWIDE LLC,
TRONOX LLC, KERR-McGEE CORPORATION
and ANADARKO PETROLEUM CORPORATION,**

Defendants.

) Chapter 11

)

) Case No. 09-10156 (ALG)

)

) Jointly Administered

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) Adv. Pro. No. 09-01198 (ALG)

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**NOTICE OF DEFENDANTS'
MOTION TO EXCLUDE THE
TESTIMONY OF DR. NEIL M.
RAM UNDER FEDERAL RULE OF
EVIDENCE 702**

PLEASE TAKE NOTICE that upon the accompanying Declaration of Thomas R. Lotterman, and the memorandum of law in support of motion, Defendants Anadarko Petroleum Corporation, Kerr-McGee Corporation, Kerr-McGee Oil & Gas Corporation, Kerr-McGee Worldwide Corporation, Kerr-McGee Investment Corporation, Kerr-McGee Credit LLC, Kerr-McGee Shared Services Company LLC and Kerr-McGee Stored Power Company LLC will move this Court for an order granting Defendants' Motion to Exclude the Testimony of Dr. Neil M. Ram Under Federal Rule of Evidence 702. A hearing will be held before the Honorable Allan L. Gropper, United States Bankruptcy Judge, in Room 617 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, date to be determined.

PLEASE TAKE FURTHER NOTICE that any responses or objections to this motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, set forth the legal and factual basis therefor, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-242, and on (i) the chambers of the Honorable Allan L. Gropper, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) Weil, Gotshal & Manges LLP, attorneys for the Defendants, 767 Fifth Avenue, New York, New York 10153 (Attn: Richard A. Rothman, Esq., and Bruce S. Meyer, Esq.) and 700 Louisiana, Suite 1600, Houston, Texas, 77002 (Attn: Melanie Gray, Esq., Lydia Protopapas, Esq., and Jason W. Billeck, Esq.); (iii) Bingham McCutchen LLP,

attorneys for the Defendants, 355 South Grand Avenue, Suite 4400, 3 Los Angeles, California 90071 (Attn: James J. Dragna, Esq.), and 2020 K Street, NW, Washington, DC 20006 (Attn: Thomas R. Lotterman, Esq. and Duke K. McCall, III, Esq.); (vi) the United States Attorneys Office, 86 Chambers Street, New York, New York 10007 (Attn: Joseph A. Pantoja, Esq.), so as to be filed and received no later than **April 6, 2012, 4:00 p.m.** (Prevailing Eastern Time) (the “Objection Deadline”).

Dated: March 16, 2012

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 16, 2012, a true and correct copy of the foregoing was served on the following counsel of record by ECF and/or as indicated below:

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/s/ Thomas R. Lotterman
Thomas R. Lotterman